

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

v.

[1] Asha Nateef Tribble,
[2] Donald Keith Ellison,
[3] Jovanda R. Patterson

Defendant.

CRIMINAL NO. 19-541 (FAB)

**REPLY TO GOVERNMENT'S MOTION FOR A
PROTECTIVE ORDER PURSUANT TO RULE 16(d)(1)**

TO THE HONORABLE COURT:

Defendant Donald Keith Ellison, through the undersigned attorneys, and in consultation with counsel for defendants Asha Nateef Tribble and Jovanda R. Patterson (collectively, "Defendants"), as well as counsel for the Government, respectfully requests that this Honorable Court grant the Government's Motion for a Protective Order Pursuant to Rule 16(d)(1), F.R.C.P. (Dkt No. 38), as modified in the attached proposed and agreed-upon Protective Order ("Exhibit A"). As stated herein, Exhibit A has been agreed to by counsel for all Defendants and counsel for the Government.

WHEREFORE, Defendant respectfully requests that this Honorable Court **GRANT** the Government's Motion for a Protective Order and issue an order in substantially similar form to the proposed protective order attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of October, 2019.

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CERTIFICATION

IT IS HEREBY CERTIFIED that on this same date I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Thomas W. Rinaldi

Thomas W. Rinaldi